

I have been a licensed amateur for 35 years, since 1967. I hold a commercial radiotelephone permit as well as an amateur extra license. My favorite amateur band is 160 meters, and I operate contests there. I have also operated in enough 160 meter contests to feel strongly about this proposal. It should not have been submitted.

I realize that the band becomes very crowded during the three annual 160 meter contests. This is to be expected. The remainder of the year you can not honestly ever find the band crowded. During a CW contest there is CW from 1800-1900 kHz. During the one SSB contest there is SSB from 1803-1950 kHz. This is a fluid situation, the contest ends and things return to normal for the rest of the year. At worst, some nets may experience a temporary inconvenience, but to set aside this much spectrum for exclusive CW is ludicrous. It exceeds any reasonable use of the band. It would be a terrible waste of spectrum.

I would suggest removing the sub bands on other amateur bands instead of creating another. Listen to the CW sub bands and see how many of them are even close to being fully occupied! I certainly can't find this to be the case, from 80 through 2 meters. Let's see consideration to removing sub bands entirely, except maybe for license classes instead of modes, like seems to be the trend in other countries.

Please reject this proposal and consider the majority of amateurs rather than "special interests".

Respectfully submitted,
P. Fred Munzenmayer K2DX